

Exhibit E

6.

- d. Check #5058413 dated August 7, 2007 in the amount of \$6,750 made payable to Doris E. Lackman and endorsed "credited to the account of the party absent endorsement" and deposited at National City Bank. (Exhibit F).
  - e. Check #5165701 dated November 19, 2007 in the amount of \$6,114.71 payable to Doris E. Lackman endorsed "Eileen J. Fern, ttr" and deposited at National City Bank, North Olmsted Branch near Fern's business. (Exhibit G).
  - f. Also attached as Exhibit H are the phone logs of Allianz detailing Fern's calls to Allianz representing that Doris needed these withdrawals as she was again in need of nursing home care.
  - g. Following the establishment of accounts at First Merit Bank on June 19, 2008, the forgeries stopped as the Allianz checks were all deposited into these account which Eileen had sole access to as "Trustee." **Total Allianz Forged Check Theft Total \$33,302.11.**
7. **THE FIRST MERIT THEFTS.** After the establishment of bank accounts at First Merit with Eileen Fern as trustee using her home address for the accounts, the direct thefts from Allianz ceased as she now had complete access to Doris funds. The accounts at First Merit were established by the Manager of the North Ridgeville Branch, Fern's husband Gary Folliett. It is our understanding that these accounts were opened by Folliett without the requisite account documentation such as copies of the Trust Documents verifying Eileen's power over Doris Lackman. Once the checking account (#4516035103) was established, the Allianz withdrawals after 2007 were directly deposited by Fern into this account. Checks written as thefts were:
- a. Check #1501 in the amount of \$878.59 on August 6, 2008 to HSBC Credit;
  - b. Check #1502 in the amount of \$530.00 on August 7, 2008 to Key Credit Card;
  - c. Check #1503 in the amount of \$2,000.00 on August 6, 2008 to "Cash";
  - d. Check #1504 in the amount of \$1,076.39 on August 27, 2008 to WFHM Mortgage (note Doris did not have a Mortgage);
  - e. Check #1506 in the amount of \$5,000.00 on August 10, 2008 made payable directly to Fern;
  - f. Check #1507 in the amount of \$1,500.00 on August 29, 2008 made payable directly to Fern;
  - g. Check #1508 in the amount of \$3,500.00 on November 4, 2008 made payable directly to Fern;
  - h. Check #1510 in the amount of \$6,000.00 on December 8, 2008 made payable directly to Fern. **Check theft total for 2008 was \$20,484.98.**
  - i. Check #1511 in the amount of \$3,038.31 on January 9, 2009 made payable to the Cuyahoga County Treasurer for property taxes on Parcel #231-35-009 owned by Eileen Fern (Check attached as Exhibit I);
  - j. Check #1513 in the amount of \$1,500.00 on January 9, 2009 made payable to Security Concepts, Fern's company;
  - k. Check #1514 in the amount of \$1,020.00 on January 16, 2009 made payable to Conesco Life Insurance, to our knowledge Doris did not have a policy;